



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Alex Poitevint, Treasurer
Republican National Committee - RNC
310 First Street, SE
Washington, DC 20003

Identification Number: C00003418

JAN 27 2000

Reference: February Monthly (1/1/99-1/31/99), March Monthly (2/1/99-2/28/99), April Monthly (3/1/99-3/31/99), May Monthly (4/1/99-4/30/99), June Monthly (5/1/99-5/31/99), July Monthly (6/1/99-6/30/99), August Monthly (7/1/99-7/31/99), September Monthly (8/1/99-8/31/99) and October Monthly (9/1/99-9/30/99) Reports

Dear Mr. Poitevint:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report discloses in-kind contributions ("donations") from corporations on Schedule H4, supporting Line 21(a) of the Detailed Summary Page. Pursuant to Advisory Opinion 1992-33, the Commission concluded that a "national party committee may accept corporate in-kind donations in connection with fundraising activities" as long as "federal share of the goods or services is paid or transferred to the non-federal account in advance" of the acceptance of the corporate donations by the federal account.

Advisory Opinion 1992-33 also discloses a detailed method for reporting the receipt of corporate in-kind contributions on the committee's Schedules as follows:

The full amount of the in-kind contributions received by the non-federal account should be disclosed on Schedule I with a supporting memo Schedule A that itemizes each contributor's identification. 11 CFR 104.8(e). In addition, in order to reflect the fact that the reported in-kind contributions have been expended in the same period as received by the committee, the